

REMARKS

Rejection of Claims on Prior Art Grounds in the 12 May 2004 Office Action and

Traversal Thereof

In the 12 May 2004 Office Action, Claims 1-183 were rejected under 35 U.S.C. 102(b) as being previously described. It is asserted herein that the prior art reference cited by the Examiner does not anticipate the present invention. Furthermore, the number of claims has been greatly reduced to more clearly state the scope of the present invention. The above rejections on the stated art grounds are traversed, and consideration of the patentability of the claims 1-213, now amended or cancelled, is requested, in light of the following remarks.

Arguments for Patentability

The applicant asserts that the present invention is both innovative and novel and can be distinguished from the relevant prior art. The Examiner cites and relies upon the Template Software reference and particularly the SNAP Development Environment as anticipating the present invention. However, closer examination of the software development tool described by SNAP reveals that the SNAP tool operates differently and has different intended uses.

The SNAP software development tool is described by Template Software as being “a family of integrated application development tools . . . for the implementation of enterprise-wide, distributed applications.” Furthermore, the SNAP software development tool operates by starting with a partially developed application template that uses predefined and customer-specific elements to “complete” the application. This approach aids the intended purpose of the SNAP tool by allowing increased software reuse which

is advantageous for an enterprise, distributed software system which requires seamless software functionality and information sharing.

By contrast, the present invention is not limited to such applications and is intended to be used by software programmers for a broad range of software programming functions including the development of non-distributed and non-enterprise applications. In addition, ***the present invention does not begin with a partially developed template.*** Instead, a programmer using the present invention begins to assemble the desired software application ***from scratch*** by using existing source code or by writing new code. This is clearly distinguishable from the SNAP tool described by Template which is “based on the ‘completion metaphor’ of a template rather than the construction approach” used by the present invention.

To further distinguish the present invention from the SNAP software development tool, it is important to note that the SNAP tool operates predominantly by using visual editors. The SNAP reference nowhere teaches the ability of the SNAP software development program to simultaneously display textual and graphical representations of the source code. By contrast, ***the present invention does provide a simultaneous display of textual and graphical representations. Modifications made to either the textual or graphical representation will be immediately translated and reflected in the other representation.*** The programmer has further flexibility to incorporate existing codes in a variety of programming languages by converting the code into a language-neutral representation. Therefore, the present invention provides a unique and useful way for software programmers to more easily create software programs for divergent software applications by allowing modifications to either the graphical or textual representations

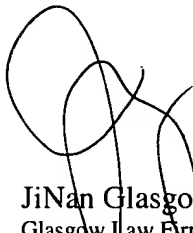
of the code and by facilitating the assembly of new and existing code from a variety of sources.

CONCLUSION

In view of the foregoing, claims 1-213, now amended or cancelled, constituting the claims pending in the application, are submitted to be fully patentable and in allowable condition to address and overcome the rejections. If any issues remain outstanding, incident to the allowance of the application, Examiner Ingberg is respectfully requested to contact the undersigned attorney at (919) 664-8222 or via email at jingang@trianglepatents.com to discuss the resolution of such issues, in order that prosecution of the application may be concluded favorably to the applicant, consistent with the applicant's making of a substantial advance in the art and particularly pointing out and distinctly claiming the subject matter that the applicant regards as the invention.

This Office Action response is submitted via US Postal Service Express Mail on August 11, 2004.

Respectfully submitted,



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